



MINUTES OF
REGULAR MEETING
Thursday and Friday, March 22-23, 2001
REGIONAL WATER QUALITY CONTROL BOARD

Thursday, March 22, 2001, 2:00 p.m.

Chairman Gary Shallcross called the meeting of the Central Coast Regional Water Quality Control Board to order at 2:07 p.m. on March 22, 2001, in the Salinas City Council Chamber Rotunda, 200 Lincoln Avenue, Salinas, California.

1. Roll Call Office Technician Carol Hewitt
[2:10 to 2:15 p.m.]

Board Members Present:

Chairman Gary Shallcross
Vice Chair Leslie Bowker
Vice Chair Bruce Daniels
John Hayashi
Jeffrey Young

2. Introductions Executive Officer Roger Briggs

Executive Officer Roger Briggs introduced staff and asked parties wishing to speak to turn in testimony cards. Mr. Briggs noted that the State Board Liaison, John Brown, has completed his term on the State Water Resources Control Board. Mr. Briggs will present a plaque of appreciation to Mr. Brown at a later time. Richard Katz will be our new State Board liaison

temporarily. Mr. Katz was unable to attend today's meeting.

There is one Supplemental Sheet for Item No. 6, MTBE Sites.

Public Forum Chair Shallcross

Mr. W. C. Woodworth asked the Board to consider the problem of Pacific Grove's beach closures with regard

to spills. He believes the Board should take a tougher stance on enforcement.

3. Salinas River Watershed Management Action Plan Update [Alison Jones 805/542-4646] Status Report

Regional Board staff, Ms. Alison Jones, updated the Regional Board and public on the Salinas River Watershed Management Action Plan implementation activities. Ms. Jones indicated that Region 3 has successfully secured funding for numerous projects related to reducing agricultural nonpoint source pollution. Most projects have focused on agriculture, since it is the predominant land use in the watershed. Funded projects include permit streamlining for

beneficial practices, implementing nitrate management and erosion controls, promoting sustainable vineyard practices, and Farm Water Quality Planning short courses. Regional Board staff have formed a technical advisory committee with the Farm Bureau, the Monterey Bay National Marine Sanctuary and other watershed partners to develop a monitoring and tracking system to quantify management practices implementation and link implementation to water

quality changes. Resources have been added to the Central Watershed Unit for the Storm Water and Nonpoint Source Programs, which will enhance Action Plan implementation. Ms. Jones noted that regulatory commitments related to discharge permits and Waste Discharge Requirements continue to be met. Regional Board staff will present another update at the end of the first two-year implementation period, in December

2001. Board Member Bruce Daniels commented on the importance of tracking management practices and water quality implementation. Kathy Thomasberg of Monterey County Water Resources Agency expressed support for Regional Board efforts to fund nitrate management activities.

4. Proposition 13 Funding Workshop [Alison Jones 805/542-4646]..... Workshop

Regional Board staff, Ms. Alison Jones, presented a workshop to inform the Board and public about funding available through the Costa-Machado Water Act (Proposition 13). The presentation was intended to solicit input on regional funding priorities. Ms. Jones indicated the State and Regional Boards will distribute a total of \$280 million through a competitive process over four funding cycles. The first funding cycle is nearing completion. Eligible projects include development of watershed management plans and implementation of projects consistent with watershed restoration action strategies. Ms. Jones mentioned that emphasis is on addressing nonpoint source pollution, beach closures, implementation of total maximum daily loads (TMDLs) and watershed protection. A table of proposed priorities was presented for comment. Ms.

Jones indicated that an additional workshop would be held April 6, 2001 in San Luis Obispo.

Board Member Jeff Young requested that TMDL implementation be listed as a priority regionwide rather than only in watersheds where TMDLs are currently being developed. He also requested that staff check future Board meeting dates to see if there would be opportunity for the Board to review proposed project rankings.

Public comments: Jonathan Berkey, Carmel Watershed Council, thanked the Regional Board for past project support and requested that planning and watershed assessment be supported.

5. MTBE Workshop [Jay Cano 805/549-3699]..... Workshop

Jay Cano, Senior Engineer, provided an introductory presentation. Mr. Cano discussed history of reformulated gasoline, other oxygenates, and a comparison of MTBE to other gasoline components. He discussed how MTBE moves more quickly than other gasoline components and thus requires more urgent action. He discussed legislative responses to the MTBE problem as well as the Regional Board response. He concluded that MTBE problems will likely continue and that will continue to put demands on Regional Board staff.

how an MTBE plume can get below the ground water surface. Finally, he showed some technologies for cleanup of MTBE in ground water.

Jon Jennings, Branch Chief, Hazardous Materials and Solid Waste Branch for Monterey County, discussed the County's role as a Local Implementing Agency for the underground tank cleanup program. Mr. Jennings discussed inspection procedures, tank certification, and follow up to leaks and reported spills.

(Chair Shallcross announced a break at 4:20 p.m. The meeting reconvened at 4:37 p.m.)

Mr. Jon Rohr, Geologist with Komex International, Inc., provided an overview of underground tank systems, possible leak scenarios and cleanup technologies. He showed overheads of how tanks could leak and get into a well system. He also showed

6. MTBE Sites [Jay Cano 805/549-3699].....Status Reports

Chevron Service Station, 2194 Main Street, Cambria

The Regional Board received a status report from Sheila Soderberg, staff geologist, detailing Chevron Products Company (Chevron) progress on the cleanup and investigation of the MTBE plume in ground water at the Chevron service station located at 2194 Main Street, Cambria. Ground water extraction and high vacuum dual phase extraction systems are currently in operation at the subject site to remove petroleum hydrocarbons in soil and prevent further migration of the MTBE detected in ground water. Ground water samples collected from the onsite and offsite ground water monitoring wells in February indicate a decrease of MTBE, benzene, and tertiary butyl alcohol in ground water. Chevron will perform ongoing testing to evaluate cleanup progress.

Ms. Soderberg also reported that Chevron is performing an Expedited Site Assessment to investigate the MTBE plume to the south in the alluvial materials near Santa Rosa Creek and investigate bedrock materials beneath the station

Mr. Ken Topping, General Manager of the CCSO, was concerned that MTBE could be flowing into Santa Rosa Creek. Mr. Topping reported that the State of California Department of Health Services (DHS) will fund CCSO's new well at the High School, however CCSO will seek payment from Chevron to repay DHS.

Ms. Helen Mays, President of the CCSO Board of Directors, expressed concern that Chevron's cleanup progress was going too slowly.

Mr. Gregory Fitzgerald, CCSO Board of Directors, indicated that two recent ground water sampling reports by Chevron were contradictory.

Mr. Peter Chaldecott, CCSO Board of Directors, indicated that Chevron is not providing all the investigation data to Regional Board staff or the CCSO.

Mr. Mark Sigler of Chevron indicated that Chevron is providing all the data that Regional Board staff has requested.

Mr. Gino Bianchi of Geomatrix, Inc., consultant to Chevron, clarified that the two recent ground water sampling reports were different: one provided ground water sampling data from soil borings and the other provided ground water sampling data from existing ground water monitoring wells.

Mr. Mark Lafferty of Chevron indicated that Chevron's QA/QC process prevents incorrect data from being disseminated.

Following Regional Board discussion, the Board directed staff to order Chevron to provide all data relating to the investigation, including raw analytical data without Chevron's QA/QC review.

Shell Service Station, 1840 Main Street, Morro Bay

Sheila Soderberg, staff geologist, presented a status report detailing Equiva Services LLC (Equiva) progress on cleanup of MTBE in ground water at the Shell Service Station at 1840 Main Street, Morro Bay. Ground water extraction and high vacuum dual phase extraction (high vac) systems are currently in operation at the subject site to remove petroleum hydrocarbons in soil and prevent further migration of the MTBE plume. Ground water samples collected from the onsite and offsite monitoring wells in February indicate a significant decrease of MTBE detected in the onsite wells.

Ms. Soderberg also reported that as a result of a recent violation hearing, Equiva and the City reached an agreement in January 2001.

Ms. Soderberg reported that Equiva is performing additional ground water modeling to determine if the system will be effective.

Los Osos Valley Garage/Bear Valley Chevron

Jay Cano, Senior Engineer, provided a brief status report. He stated vacuum trucks have been pumping water from the monitoring wells twice per week. Future work includes additional soil and ground water investigation in the next few weeks leading to a cleanup alternatives plan by May 31, 2001.

Quickstop Market No. 78, Santa Cruz County

Bob Hurford, staff engineer, presented a status report on the leaking underground storage tank investigation and cleanup case, at the Quik Stop Market, 5505 Soquel Drive, Soquel. Mr. Hurford discussed details of the leak discovery, subsequent cleanup actions, groundwater monitoring history, and proposed future investigation and cleanup work. The presentation included an aerial photograph depicting the location of private and municipal water supply wells with respect to the leak site, discussion of additional subsurface investigation, and a description a permanent groundwater extraction system to control MTBE migration.

The Board asked several questions and directed staff to:

1. Inform downgradient well users.
2. Sample wells and possibly the lagoon downgradient.
3. Investigate for leak test.
4. Investigate accelerated interim pumping.

Staff will follow-up as requested.

Regionwide MTBE Site List

Following several questions, the Board directed staff to request status reports for Local Oversight Program sites (e.g., Santa Barbara and Santa Clara Counties).

Chairman Shallcross adjourned the public meeting at 6:33 p.m.

Friday, March 23, 2001, 8:32 a.m.

7. Roll Call Office Technician Carol Hewitt
[8:33-8:36 a.m.]

Board Members Present:

Chairman Gary Shallcross
Vice Chair Leslie Bowker
Vice Chair Bruce Daniels
John Hayashi
Jeffrey Young

8. Introductions Executive Officer Roger Briggs

Executive Officer Roger Briggs introduced staff and asked all interested parties to complete and turn in testimony cards. The new State Board liaison, Richard Katz, was unable to attend the meeting. John Brown's term as State Board liaison expired. Mr. Briggs has

told Mr. Brown that Region 3 has a plaque of appreciation for his excellent service and support to the Central Coast Regional Board. Supplemental sheets are as follows: Ballard Canyon, Items 12, 13, 18, and 27 (Santa Cruz Biotechnology, Inc.).

9. Approval of Minutes for February 1-2, 2001 Board Motion

MOTION: Bruce Daniels moved to approve the minutes of February 1-2, 2001. **SECONDED** by Les Bowker.
CARRIED – Unanimously (5-0)

10. Public Forum..... Chair Shallcross

Mr. Buddy Fallon, property owner discussed a neighboring property (horse farm) and the drainage of water and concerns for long term pollution and contamination of his well and property downstream. Mr. Fallon shared photos of manure piles and asked the Board to consider the issue. Bruce Daniels asked if any testing had been done at the site. The Board also asked about the size of the manure piles at the site. Chair Shallcross suggested that staff contact Mr. Fallon and evaluate the problem. Mr. Briggs introduced Mr. Fallon to Chris Adair, Senior Engineer for the Northern Watershed Branch. Regional Board staff will provide follow-up on the issue.

Mr. Marvin Niccum discussed Buena Vista Mine and work done by the EPA on the mine. Mr. Niccum stated that the work completed by the EPA was of poor quality resulting in the generation of sediment and run off of 0.55 milligrams per liter of mercury. Mr. Briggs noted that the Board will continue to provide periodic updates on Buena Vista Mine.

Mr. Larner expressed his dissatisfaction with the process for investigating landfill impacts on

groundwater in the area. Mr. Larner stated the County of Santa Barbara was not negotiating a settlement in good faith and is not providing sufficient supplemental water supply.

Counsel for Mr. Larner (John Kenneth Dorwin) spoke in support of Mr. Larner and his assertions of excessive project delays and inadequate action by Santa Barbara County.

Both Mr. Larner and his Counsel stated that a "model" of the pollution should be produced and 300gpm of supplemental water should be made available.

Executive Officer Briggs stated that misunderstanding of the use and implication of the term "model" seemed evident and committed staff to clarifying the issue.

Board Member Hayashi questioned Mr. Larner's assertion that the County should provide water to an assumed level (300GPM) and stated that he felt the replacement should be for the amount available when the pollution was discovered (90GPM).

11. Uncontested Items..... Board Motion

Executive Officer Briggs proposed to remove Items 19 and 20 from the consent calendar. Chair Shallcross proposed to remove Items 15 and 18 from the consent

calendar. Items 14, 15, 16, 18, 21, 22, and 23 are proposed to remain on the consent calendar.

MOTION: Bruce Daniels moved Items 14, 16, 21, 22, 23 be approved as consent items. SECONDED by John Hayashi. CARRIED – Unanimously (5-0)

12. Highlands Inn Wastewater Treatment Plant, Monterey County Order No. 01-011 [Tom Kukol 805/549-3689]

Regional Board staff engineer, Tom Kukol, gave a short presentation describing the Facility, the discharge, changes proposed by the Discharger, the Discharger's compliance history, the receiving water, and the proposed Order. Roger Briggs reminded the Regional Board that supplemental changes provided,

should be considered. The Regional Board inquired about many topics including effluent bacterial limits, biosolids monitoring, and receiving water monitoring. During the inquiry and discussion, the Regional Board proposed modifications to proposed Order No. 01-011.

MOTION: John Hayashi moved to adopt Order No. 01-011 with the proposed changes. SECONDED by Bruce Daniels. CARRIED – Unanimously (5-0) Executive Officer Briggs described the changes as follows:

1. The proposed Order would include the supplemental sheet items.
2. Effluent Limit B.15 would be added that requires tertiary effluent to meet Title 22 Secondary 2.2 standards.
3. Table 3 bacteriological limitations would be altered as directed by the Regional Board.
4. The Monitoring and Reporting Program would require Biosolids monitoring and reporting.
5. The proposed Order would include a provision requiring the Discharger to contribute \$5,000 to the Central Coast Ambient Monitoring Program. The Provision would provide a reasonable deadline for the contribution and the contribution would occur only once during the life of the Permit.

13. Highlands Sanitary Association, Monterey County [Tom Kukol 805/549-3689] Order No. 01-012

Regional Board staff engineer, Tom Kukol, gave a short presentation describing the Facility, the discharge, changes proposed by the Discharger, the Discharger's compliance history, the receiving water, and the proposed Order. Roger Briggs reminded the Regional Board that supplemental changes provided, should be considered. The Regional Board inquired about many topics including operation and

maintenance of the plant and outfall, access to the disposal area, who should be named as the Discharger, effluent bacterial limits, water contact issues, other sources for receiving water bacteriological impacts, biosolids monitoring, and receiving water monitoring. During the inquiry and discussion, the Regional Board proposed modifications to proposed Order No. 01-012.

MOTION: Bruce Daniels moved to adopt Order No. 01-012 with the proposed changes. SECONDED by John Hayashi. CARRIED – Unanimously (5-0) Executive Officer Briggs described the changes as follows:

1. The proposed Order would include the supplemental sheet items.
2. The proposed Order would include a provision requiring the Discharger to verify the integrity of outfall by June 1.
3. The proposed Order would include a provision requiring the Discharger to submit documentation that necessary permission has been granted to access to the outfall line.
4. The proposed Order would include a provision establishing a two-year Permit term.
5. The proposed Order would include a provision requiring the Discharger to contribute \$1,000 to the Central Coast Ambient Monitoring Program. The Provision would provide a reasonable deadline for the contribution and the contribution would occur only once during the life of the Permit.
6. The Monitoring and Reporting Program would continue the Discharger's existing outfall inspection language.
7. The Monitoring and Reporting Program would require bi-monthly reporting for the first year.

15. Growers Ice Company, Monterey County [Martin Fletcher 805/549-3694] Order No. 01-016

Executive Officer Briggs briefly introduced the item and mentioned that staff engineer, Martin Fletcher, was available to answer questions. Chair Shallcross asked about effluent limit "backsliding" and if the nitrates and total dissolved solids were the only proposed limits subject to the backsliding exceptions. Mr. Fletcher verified that the proposed nitrates and total dissolved solids limits were the only ones subject to backsliding consideration. Chair Shallcross asked about the Discharger's inability to completely connect to the industrial sewer. Mr. Fletcher responded that complete connection had not occurred due to both physical and

financial reasons. Mr. Fletcher stated that the Discharger had invested time and capital in late 1999 to complete the partial industrial sewer connection, improving compliance during 2000. Mr. Fletcher indicated that the Discharger is evaluating the cost effectiveness of connecting all waste streams into the industrial sewer. Chair Shallcross indicated that it would be in the Discharger's best interest to include all potential costs in its evaluation, including those resulting from the California Toxics Rule requirements and civil liability associated with SB709, "Migden

Legislation." There were no other comments or questions from the Public or the Board.

MOTION: Bruce Daniels moved to approve Order No. 01-016. SECONDED by Leslie Bowker. CARRIED – Unanimously (5-0)

(Chair Shallcross announced a lunch break and closed session meeting at 11:50 a.m. The meeting reconvened at 1:25 p.m.)

17. Enforcement Report [Brad Hagemann 805/549-3697] Status Report

Executive Officer Briggs pointed out that for certain types of violations, we are letting accrue and bringing batches of Migden Administrative Civil Liabilities. Bruce Daniels raised concerns about the number of violations occurring in Monterey and South Counties. Jeffrey Young asked about the Goleta Sanitary District actions to prevent discharges. Roger Briggs noted that Michael Higgins had reported that the work had been completed to prevent discharges. Brad Hagemann will verify that information.

Mr. W. C. Woodworth raised concerns about the Monterey Peninsula and "who is doing what to whom." Mr. Briggs noted that a City of Pacific Grove report was provided in our last mailing as well as a staff perspective. Also, the Stormwater Phase II regulation for the smaller communities is proceeding.

18. Johnson Canyon Landfill, Monterey County [Frank DeMarco 805/542-4638] Order No. 01-020

Chair Shallcross questioned the reasoning regarding the conditional prohibition for disposal in Modules I, II, and III at the Johnson Canyon Landfill. Michael LeBrun of Board Staff responded that Evaluation Monitoring was ongoing at the site and prohibiting

disposal in the area at this time was not justified, thus the conditional prohibition.

MOTION: Bruce Daniels moved to approve Order No. 01-020 with changes as proposed in the Supplemental Sheet. SECONDED by Leslie Bowker. CARRIED – Unanimously (5-0)

19. Atascadero Wastewater Treatment Facility, City of Atascadero, San Luis Obispo County.....Order No. 01-014 [David Athey - 805/542 4644]

Staff Engineer, Mr. David Athey, provided minor editing changes. The changes included adding PCBs, VOCs, and Pesticide effluent monitoring every five years, citing the correct Environmental Assessment Finding, eliminating a footnote on the Effluent Limits Table, and adding a finding covering assimilative capacity and percolated wastewater reuse. Mr. Athey also proposed changing the Total Nitrogen effluent limit of 50 mg/l to a Nitrate (as Nitrogen [N]) effluent limit of 8 mg/l. Mr. Athey explained that setting a

Nitrate (as N) limit of 8 mg/l is consistent with the Nitrate groundwater limit.

Board Member Bruce Daniels asked why there was no Total Coliform Bacteria monitoring for this discharge since previous Permits, like Heritage Ranch, included such testing. Mr. Athey clarified that this discharge is to percolation ponds, and like similar discharges, is not required to monitor bacteria. Mr. Daniels asked if there is a reasonable potential for bacteria to be found in the reclaimed shallow percolated effluent. Mr. Athey

responded that the potential would be very low. Branch Chief, Mr. Brad Hagemann further clarified that the Discharger conducted routine bacteria sampling when reclaiming shallow groundwater was initiated. Data showed no positive bacteria results. Mr. Athey suggested bacteria monitoring be added and

indicated that the addition was acceptable to the Discharger.

Mr. Athey concluded his presentation and recommended the Order and monitoring be adopted to include the proposed changes.

MOTION: Leslie Bowker moved to approve Order No. 01-014 with proposed changes. SECONDED by Jeffrey Young. CARRIED – Unanimously (5-0)

20. Atascadero State Hospital Wastewater Treatment Plant, California Department of Mental Health, San Luis Obispo County [David Athey - 805/542 4644].....Order No. 01-002

Staff Engineer, Mr. David Athey, provided minor editing changes. The changes included deleting effluent monitoring for Total Coliform Organisms, Chlorine Used and "Title 22 Metals," citing the correct Environmental Assessment Finding, and adding a finding covering assimilative capacity and percolated wastewater reuse. Mr. Athey explained that the plant no longer provides reclaimed wastewater directly to the Chalk Mountain Golf Course, hence, there is no further need for the Chlorine and Total Coliform effluent

requirements. Board Member, Mr. Bruce Daniels asked if the Discharger should also monitor bacteria in the shallow percolated effluent, upon reuse. Mr. Athey responded that the State Hospital discharges to ponds operated by the City of Atascadero, since the City will monitor for bacteria, staff believes having the State Hospital monitor the same would be duplicative and unnecessary.

MOTION: Leslie Bowker moved to approve Order No. 01-002 including the proposed changes. SECONDED by John Hayashi. CARRIED – Unanimously (5-0)

24. Emergency, Abandoned, Recalcitrant Account Priority List for Fiscal Year 2001-2001.....Res. No. 01-001 [Jay Cano 805/549-3699]

Jay Cano, Senior Engineer, reported that every year the State Water Resources Control Board requests nominations from the Regional Boards for sites that need funding for cleanups. The funding is for sites that are abandoned sites, recalcitrant sites, and emergency

cleanups. Sites nominated for cleanup this year include Elkhorn Suprette in Castroville, Pajaro Beacon in Pajaro and Outport Petroleum in Watsonville. Mr. Cano recommended that the sites be approved to be placed on the Account.

MOTION: Bruce Daniels moved to adopt Resolution No. 01-001. SECONDED by Leslie Bowker. CARRIED – Unanimously (5-0)

26. Reports by Regional Board Members.....Status Report

Chair Shallcross reported that he attended the Chairs Meeting in Sacramento on February 8, 2001. He noted that some regions found that Board/staff offsite meetings with discussion emphasis on procedures were

very helpful. Chair Shallcross suggested that our region consider having this type of offsite meeting and that Executive Officer Briggs generate an email to survey the Board with regard to the offsite.

27. Executive Officer's Report..... Roger Briggs

Executive Officer Roger Briggs brought the Board's attention to the Morro Bay National Estuary Program grant proposal and pointed out that the Regional Board was proposing to enter into a grant with USEPA for the estuary program. There were no Board member objections.

Mr. Briggs referred to the Los Osos status reports and told the Board that staff would bring back additional information on the May agenda to discuss project progress. Mr. Briggs described his meetings with a former District Director and a subsequent meeting with Community Services District President Bowker, Director Gustafson, and General Manager Bruce Buel.

Mr. Briggs referred to the supplemental sheet for Santa Cruz BioTechnology, Inc. (SCBI) which recommends continued monitoring of the site to determine if bacterial concentrations continue to decrease. Matt Mullen from SCBI summarized their efforts to stabilize the site and protect surface waters. Dr. Atwell from UC Davis described his evaluation of the site and conclusion that most recent bacterial results are most likely from naturally occurring watershed sources.

Mr. Briggs provided an update on the Adventco Holding Corporation, The Inn at Pasatiempo regarding staff's sampling inspection. Analyses indicate the treatment system is removing nitrogen, although it is not yet fully meeting requirements. As this is a new system, additional time may allow the system to come into compliance.

For the Unocal Guadalupe oil field, Mr. Briggs pointed out the written recommendation regarding a Conditional Waiver of Waste Discharge Requirements.

Chairman Shallcross adjourned the public meeting at 2:55 p.m.

The meeting was audio recorded and the minutes were reviewed by management, and approved by the Board at its May 17-18, 2001 meeting in San Luis Obispo, CA.

There was no objection from the Board on this procedure.

In conjunction with the State Board/Coastal Commission joint meeting, Mr. Briggs said the two-day field trip for the State Board members and Secretary Hickox went very well. Staff sent thank you letters to those who hosted portions of the tour.

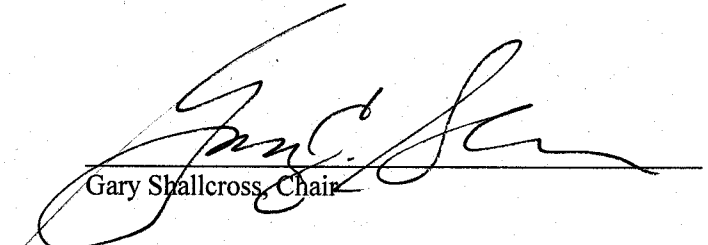
Mr. Briggs reminded the Board members about getting in their reservations for the WQCC meeting.

In reference to the personnel hiring and recruitment report, Mr. Briggs pointed out that with the new hires, staff has gained one AA degree, fourteen Bachelor degrees, nine Master degrees, one Doctorate degree, two registered Geologists, and two certified Hydrogeologists. Bruce Daniels complimented staff for its productive efforts in recruiting.

Bruce Daniels asked about the volume of soil that is to be left in place at the Pacific Union Apartments site in Santa Cruz. Jay Cano indicated that he would report back at the next meeting.

Jeff Young suggested that staff coordinate with Monterey County Environmental Health and Cal Trans to follow-up on a number of watershed issues in Carmel Highlands. Mr. Briggs indicated that he would do so and provide progress reports regularly.

Chair Shallcross asked Mr. Briggs to send a thank you letter to the Gideon's with a special thanks to Tammy the tour guide, for the Elkhorn Slough Safari Tour that the Board members attended on the previous day.



Gary Shallcross, Chair